

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

MATCH GROUP, LLC

Plaintiff,

V.

BUMBLE TRADING INC., BUMBLE HOLDING, LTD., Badoo TRADING LIMITED, MAGIC LAB CO., WORLDWIDE VISION LIMITED, Badoo LIMITED, Badoo SOFTWARE LIMITED, and Badoo TECHNOLOGIES LIMITED,

No. 6:18-cv-00080-ADA

Defendants.

BUMBLE TRADING INC. and BUMBLE HOLDING, LTD.,

JURY TRIAL DEMANDED

Cross-Plaintiffs,

V.

**MATCH GROUP, LLC and
IAC/INTERACTIVECORP,**

Cross-Defendants.

[PROPOSED] DISCOVERY ORDER

Following the Markman hearing, the following discovery limits will apply to this case.¹ .

1. Interrogatories: 35 per side
 2. Requests for admission: 50 per side
 3. Requests for Production: 110 per side
 4. Fact Depositions: 90 hours per side (for both party and non-party witnesses combined)

¹ Unless a discovery request is expressly directed to a single entity, each discovery request will be requested commonly amongst all entities on that side.

5. Expert Depositions: 7 hours per report²

Electronically Stored Information. As a preliminary matter, the Court will not require general search and production of email or other electronically stored information (ESI), absent a showing of good cause. If a party believes targeted email/ESI discovery is necessary, it shall propose a procedure identifying custodians and search terms it believes the opposing party should search. The opposing party can oppose, or propose an alternate plan. If the parties cannot agree, they shall contact chambers to schedule a call with the Court to discuss their respective positions.

DISCOVERY DISPUTES

A party may not file a Motion to Compel discovery unless: (1) lead counsel have met and conferred in good faith to try to resolve the dispute, and (2) the party has contacted the Court (with opposing counsel) to arrange a telephone conference to summarize the dispute and the parties respective positions. After hearing from the parties, the Court will determine if further briefing is required.

GENERAL ISSUES

1. The Court does not have a limit on the number of motions for summary judgment (MSJs); however, the cumulative page limit for Opening Briefs for all MSJs is 50 pages per side.
2. The Court encourages the submission of briefs longer than 10 pages via audio file so that the Court can listen to the arguments. The recordings shall be made in a neutral fashion, citations need not be read as part of the recording, and each such file shall be served on opposing counsel. Counsel should contact chambers for procedures to submit audio files.
3. The Court will entertain reasonable requests to streamline the case schedule and discovery and encourages the parties to contact the Court (with opposing counsel) when such interaction might help streamline the case.

SIGNED this 30th day of September, 2019.



ALAN D. ALBRIGHT
UNITED STATES DISTRICT JUDGE

² For example, if a single technical expert submits reports on both infringement and invalidity, he or she may be deposed for up to 14 hours in total.